

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

THE STATE OF MISSOURI; THE STATE OF  
TEXAS,

Plaintiffs,

v.

JOSEPH R. BIDEN, in his official capacity as  
President of the United States, *et al.*

Defendants.

No. 7:21-cv-00420  
(formerly No. 6:21-cv-00052)

THE GENERAL LAND OFFICE OF TEXAS, and  
DAWN BUCKINGHAM, M.D., in her official capacity  
as Commissioner of the Texas General Land Office,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF HOMELAND  
SECURITY; and ALEJANDRO MAYORKAS, in his  
official capacity as Secretary of the Department of  
Homeland Security,

Defendants.

No. 7:21-cv-00272

**UNOPPOSED JOINT MOTION TO EXCEED WORD LIMIT FOR CONSOLIDATED  
RESPONSES TO THE MOTIONS TO INTERVENE**

Plaintiffs and Defendants jointly request permission exceed the Court's word limit for their respective responses to the pending motions to intervene. The Court has established a deadline of Friday, May 10, 2024, for Plaintiffs and Defendants to respond to five pending motions to intervene. *See* ECF No. 178. Plaintiffs and Defendants intend to file separate

omnibus responses to the pending motions. To facilitate the efficient presentation of the facts and arguments in single briefs responsive to all five motions, Plaintiffs and Defendants respectfully request permission to file briefs of no more than 8,000 words. The proposed intervenors will not be prejudiced by this request. The requested extension is significantly less than the 25,000 total words that Plaintiffs and Defendants would be allotted under the Court's procedures if they filed separate briefs of 5,000 words in response to each motion to intervene.

*See* Court Procedures Rule 16.c.

Diamond A Ranch, Sierra Club, and Texas Sterling do not object to the requested word-limit extension. Southern Border Constructors and RKE Contractors take no position on the motion.

For the foregoing reasons, the Court should grant Plaintiffs and Defendants' requested word-limit extension. A proposed order is attached.

Date: May 8, 2024

Respectfully submitted,

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**CERTIFICATE OF WORD COUNT**

I certify that the foregoing document contains 194 words, exclusive of matters designated for omission, as counted by Microsoft Word.

/s/ Andrew I. Warden  
ANDREW I. WARDEN

**CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2024, I electronically filed a copy of the foregoing motion. Notice of this filing will be sent via email to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF System.

/s/ Andrew I. Warden  
ANDREW I. WARDEN

**CERTIFICATE OF CONFERRAL**

I hereby certify that on May 8, 2024, I sent an email to counsel for the five proposed intervenors requesting their position on the relief sought in this motion. Diamond A Ranch, Sierra Club, Texas Sterling do not object to the requested word limit extension. Southern Border Constructors and RKE Contractors take no position on the motion.